

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter Of)
)
Amendment of the Commission's)
Rules To Establish New Personal)
Communications Services)

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY
GEN Docket No. 90-314

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OPPOSITION OF THE PERSONAL
COMMUNICATIONS INDUSTRY ASSOCIATION

The Personal Communications Industry Association ("PCIA") herewith submits its opposition to the Joint Request for Clarification filed by the Association for Maximum Service Television, Inc. et al. ("AMSTV et al.").¹ AMSTV et al. seek to create a guardband or limit the power of PCS transmitters in the 1970-1990 MHz band in order to minimize the potential for interference to broadcast auxiliary operations in the adjacent 1990-2110 MHz band. As discussed below, PCIA opposes AMSTV et al.'s requested "clarification" since PCS operations do not appear to pose a significant threat to broadcast auxiliary receivers and the requested relief would severely limit the flexibility of PCS operations in the 1970-1990 MHz band.

As an initial matter, PCS base stations do not appear to pose a threat to broadcast auxiliary operations. Although AMSTV et al. argue that PCS base stations operating under the existing rules would cause "disruption and harmful interference,"²

¹ Joint Request for Clarification by the Association for Maximum Service Television, Inc. et al., GEN Docket 90-314 (filed July 25, 1994) ("AMSTV Request").

² AMSTV et al. Request at 6.

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broadcast auxiliary operations have managed to co-exist adjacent to operational fixed service ("OFS") microwave facilities without special guardbands or even special coordination procedures. These OFS facilities are authorized to operate at +45 dBW e.i.r.p. throughout the 1850-1990 MHz band,³ significantly greater power than PCS base stations.⁴ Furthermore, while PCS licensees are required to attenuate their out-of-band emissions by $43 + 10 \log(P)$ dB or 80 dB, whichever is the lesser attenuation, OFS users are required to attenuate their out-of-band emissions by only 25 to 35 dB at frequencies removed from their assigned frequency by up to 250 percent of their authorized bandwidth.⁵

In addition, any attempt to respond to the requested clarification would impose a significant burden on PCS licensees. If the Commission were, for example, to allocate 1970-1990 MHz as a guard band as requested, it would eliminate one half of the 30 MHz allocation designated Block C and one half of the 10 MHz allocation designated Block F. Even if the Commission were to restrict the 1970-1990 MHz band to mobile operations, the action would effectively require the Block C and Block F licensees to adopt frequency division multiplexing technologies in lieu of time division schemes. Either "clarification" would

³ 47 C.F.R. §94.73.

⁴ PCS base station operate at a maximum of 1640 Watts e.i.r.p., or approximately +32 dBW.

⁵ 47 C.F.R. § 94.71.

substantially adversely affect the delicate market balance struck by the Commission's reconsideration order, which was supported by a broad range of industries, and delay the introduction of PCS.

For the foregoing reasons, PCIA urges the Commission to reject the request for clarification filed by AMSTV et al. The request addresses a problem that has not yet materialized in a manner that creates significant adverse impacts on PCS. To the any interference problems arise, the Commission has adequate means at its disposal to rectify such problems as PCS is being deployed.

Respectfully submitted,

**THE PERSONAL COMMUNICATIONS
INDUSTRY ASSOCIATION**

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Dated: August 30, 1994

CERTIFICATE OF SERVICE

I, Kimberly Riddick, on this 30th day of August, 1994, caused copies of the foregoing "Opposition" to be served, First-Class Mail, postage pre-paid, upon the following:

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